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Rich Gannon / Jason Robinson DENR - Division of Water Quality, Planning Section 1617 Mail Service Center Raleigh, NC 27699-1617

To Whom It May Concern:

The Guilford Soil & Water Conservation District has a great interest and concern about protecting the quality of water in the Jordan lake Reservoir.

We have several comments concerning the Proposed Rules for the Jordan Lake Watershed.

- 1. First, we would like to see credit given for the .0200 Animal operations who installed many nutrient management practices in the last 10 years to meet the Animal Waste requirements and have a certified waste management plan. The baseline year should begin in 1997 in order to capture all the work done to bring hundreds of animal operations in compliance with water quality standards.
- 2. Structural practices such as ponds should be counted as a nutrient reduction practice, because of their sediment and nutrient trapping capacity.
- 3. The minimum size of affected livestock operations should be raised to the size requirements used for .0200 operations. i.e. 75 or more horses, 100 or more confined cattle, 250 or more swine, 1000 or more sheep and 30,000 or more confined poultry (with a liquid Waste system).

We appreciate your consideration of these comments.

Sincerely,

Glenn Crutchfield, Chairman Guilford Soil & Water Conservation District